

EXHIBIT

“A”

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

-----X
REGINALD HYPPOLITE,

Plaintiff,

-against-

FEDEX GROUND PACKAGE SYSTEM, INC.,

Defendant.
-----X

Index No.:

Date Filed:

**Plaintiff designates Queens
County as the place of trial.**

SUMMONS

**The basis of venue is
plaintiff's residence:**

**16-21 10th Avenue,
Queens Village, New York
11429.**

TO THE ABOVE NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the plaintiff's attorney within twenty (20) days after the service of this Summons, exclusive of the day of service (or within thirty (30) days after service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: Carle Place, New York
December 23, 2021

Yours, etc.

LAW OFFICE OF ALAN M. SANDERS, LLC

Brian Sanders

BRIAN M. SANDERS, ESQ.
Attorneys for Plaintiff
REGINALD HYPPOLITE
One Old Country Road - Suite 320
Carle Place, New York 11514
516-742-6400

DEFENDANT'S ADDRESS

FEDEX GROUND PACKAGE
SYSTEM, INC.
28 Liberty Street, New York
New York 10005

**SUPREME COURT OF THE STATE OF NEW YORK
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**VERIFIED
COMPLAINT**

Plaintiff, REGINALD HYPPOLITE, by and through his attorneys, LAW OFFICE OF ALAN M. SANDERS, LLC, complaining of defendant FEDEX GROUND PACKAGE SYSTEM, INC., respectfully shows to the Court and alleges:

1. At all times hereinafter mentioned plaintiff REGINALD HYPPOLITE was and still is a resident of the County of Queens, State of New York.
2. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC., maintained a place of business at 1 Aerospace Boulevard, Bethpage, New York 11714.
3. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC., was a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.
4. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC., was a foreign corporation duly organized and existing under and by virtue of the laws of the State of New York.
5. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC., was a business entity authorized to do and/or

doing business in the State of New York.

6. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC., was and still is a limited liability corporation duly organized and existing under and by the virtue of the laws of the State of New York.

7. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC. operated, managed and controlled certain premises, including its appurtenances, located at 1 Aerospace Boulevard, Bethpage, New York 11714.

8. At all times hereinafter mentioned and upon information and belief, defendant FEDEX GROUND PACKAGE SYSTEM, INC., its agents, servants and/or employees was responsible for the operation, maintenance, control and supervision of the premises located at 1 Aerospace Boulevard, Bethpage, New York 11714.

9. At all times hereinafter mentioned, defendant FEDEX GROUND PACKAGE SYSTEM, INC. its agents, servants and/or employees created and/or caused to be created a dangerous, unsafe and hazardous condition at said premises and permitted said condition to exist.

10. On or about the 26th day of August, 2020, and prior to the accident herein, defendant FEDEX GROUND PACKAGE SYSTEM, INC., its agents, servants and/or employees were negligent in the operation, control, supervision and maintenance of the premises located at 1 Aerospace Boulevard, Bethpage, New York 11714.

11. On or about the 26th day of August, 2020, plaintiff REGINALD HYPPOLITE was lawfully on the premises located at 1 Aerospace Boulevard, Bethpage, New York 11714.

12. On or about the 26th day of August, 2020, on the premises located at 1 Aerospace Boulevard, Bethpage, New York 11714, due to the negligence of defendant FEDEX GROUND

PACKAGE SYSTEM, INC., its agents, servants and/or employees, plaintiff REGINALD HYPOLITE was caused to sustain severe and serious personal injuries.

13. Defendant FEDEX GROUND PACKAGE SYSTEM, INC., its agents, servants and/or employees had actual notice of the conditions complained of and/or created the conditions complained of, or the conditions complained of had existed for a sufficient length of time prior to the happening of the accident that in the exercise of reasonable care, defendant could have or should have had such notice.

14. The aforesaid occurrence was caused solely and wholly by the negligence of defendant FEDEX GROUND PACKAGE SYSTEM, INC., its agents, servants and/or employees, without any negligence on the part of plaintiff REGINALD HYPOLITE contributing thereto.

15. This action falls within one or more of the exceptions set forth in Civil Practice Laws and Rules Section §1602.

16. By reason of the foregoing, plaintiff REGINALD HYPOLITE was rendered sick, sore, lame and disabled, and his injuries, upon information and belief, will be of a permanent nature, and that by reason thereof, he has been and will be prevented in the future from following his usual vocation, and has been and will be obligated in the future to incur and expend monies for medical care, medicines and treatment, all to his damage in the sum of FIVE MILLION (\$5,000,000.00) DOLLARS.

WHEREFORE, plaintiff REGINALD HYPOLITE demands judgment against defendant FEDEX GROUND PACKAGE SYSTEM, INC. in the sum of FIVE MILLION (\$5,000,000.00) DOLLARS; together with the costs and disbursements of this action and for such other and further relief as this Court may deem just and proper.

Dated: Carle Place, New York
December 23, 2021

Yours, etc.

LAW OFFICE OF ALAN M. SANDERS, LLC

Brian Sanders

BRIAN M. SANDERS, ESQ.

Attorneys for Plaintiff

REGINALD HYPPOLITE

One Old Country Road - Suite 320

Carle Place, New York 11514

516-742-6400

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SUMMONS AND VERIFIED COMPLAINT

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CERTIFICATION PURSUANT TO RULE 130-1.1a

I, the undersigned, am an attorney admitted to practice in the Courts of the State of New York, and say that my signature below is in lieu of my signature on each of the papers contained herein.

.....
Brian Sanders

BRIAN M. SANDERS

LAW OFFICES OF ALAN M. SANDERS, LLC
ATTORNEYS FOR PLAINTIFF(S)
REGINALD HYPPOLITE
ONE OLD COUNTRY ROAD - SUITE 320
CARLE PLACE, NEW YORK 11514

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